[PROPOSED] ORDER CASE No. 2:23-CV-1372-JNW SEATTLE, WASHINGTON 98101 Tel: (206) 905-7000

Plaintiffs Laura Abbott, Jill Cappel, Michelle Estep, Maria Khangi, Joshua Soto Lopez, Melissa Urbancic, Heriberto Valiente, and Vince Vojtko, individually and on behalf of all others similarly situated ("Plaintiffs"), by and through undersigned counsel, and Defendant Amazon.com, Inc. ("Amazon") (together, the "Parties") hereby jointly move the Court to enter the foregoing case schedule.

On July 16, 2024, the Parties filed a Joint Status Report and Discovery Plan, in which the Parties proposed case deadlines for discovery and class certification briefing. Dkt. 70. The Court has not yet set a case schedule.

The Parties have continued to confer, and have now reached an agreement on a proposed case schedule:

Event	Deadline
1 2 2	
Report to the Court on the Status of Discovery	March 3, 2025
Substantial Completion of Document Production	May 5, 2025
Deadline for Filing Any Motion to Compel Discovery	
Related to Class Certification	June 2, 2025
End of Fact Discovery	September 8, 2025
Deadline for Motion for Class Certification	
Deadline for Disclosure of Any Expert Report(s)	
Supporting Class Certification	September 29, 2025
Deadline for Depositions of Plaintiffs' Experts	November 21, 2025
Deadline for Opposition to Class Certification	
Deadline for Disclosure of Any Expert Report(s) Opposing	
Class Certification	
Deadline for Daubert Motion(s) Directed to Plaintiffs'	
Experts' Class Certification Report(s)	December 22, 2025
Deadline for Depositions of Amazon's Experts	January 23, 2026
Deadline for Reply in Support of Class Certification	
Deadline for Disclosure of Any Rebuttal Expert Report(s)	
Deadline for Daubert Motion(s) Directed to Defendants'	
Experts' Class Certification Report(s)	
Deadline for Opposition to Any Daubert Motion(s)	
Directed to Plaintiffs' Experts' Class Certification Reports	February 6, 2026

Deadline for Depositions of Plaintiffs' Rebuttal Experts	February 27, 2026
Reply to any Daubert Motion Directed to Plaintiffs' Experts' Class Certification Reports	March 6, 2026
Opposition to Any Daubert Motion Directed to Amazon's Experts' Class Certification Reports	March 13, 2026
Reply to Any Daubert Motion Directed to Amazon's Expert's Class Certification Reports	April 3, 2026
Class Certification Hearing	TBD

WHEREFORE, the Parties respectfully request an Order from the Court entering the above-described case schedule.

Quinn Emanuel Urquhart & Sullivan LLP 1109 First Avenue, Suite 210 Seattle, Washington 98101 Tel: (206) 905-7000

1	Dated: January 30, 2025.	Respectfully submitted,
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STIPULATED MOTION RE CASE SCHEDULE AND [PROPOSED] ORDER CASE NO. 2:23-CV-1372-JNW

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1 By: /s/ Brian D. Buckley Brian D. Buckley, WSBA #26423 2 Deena J.G. Feit, WSBA # 59036 FENWICK & WEST LLP 3 401 Union Street, 5th Floor Seattle, WA 98101 4 Tel: 206.389.4510 Fax: 206.389.4511 5 bbuckley@fenwick.com 6 dfeit@fenwick.com 7 Jedediah Wakefield (pro hac vice) Mary Griffin Sims (pro hac vice) 8 Samantha Ong (pro hac vice) 9 FENWICK & WEST LLP 555 California Street, 12th Floor 10 San Francisco, CA 94104 Tel: 415.875.2300 11 Fax: 415.281.1350 Email: jwakefield@fenwick.com 12 mgriffin@fenwick.com 13 song@fenwick.com 14 Attorneys for Defendant Amazon.com, Inc. 15 **ORDER** 16 Based on the foregoing, IT IS SO ORDERED. 17 DATED: January 30, 2025 18 19 20 The Honorable Jamal N. Whitehead UNITED STATES DISTRICT JUDGE 21 22 23 24 25 26 27 28

STIPULATED MOTION RE CASE SCHEDULE AND [PROPOSED] ORDER CASE No. 2:23-CV-1372-JNW

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